



CSS Long Term Control Plan Update

Public Participation Plan

**City of Alexandria Department of Transportation and
Environmental Services**

October 2014



GREELEY AND HANSEN

In association with

WATERFORD

Table of Contents

Section 1 Introduction	1-1
1.1 Overview, Goals and Objectives of Public Participation.....	1-1
Section 2 Stakeholders.....	2-1
2.1 External.....	2-1
2.2 Internal	2-2
Section 3 Key Messages.....	3-1
Section 4 Challenges and Opportunities	4-1
4.1 Challenges	4-1
4.2 Opportunities.....	4-1
Section 5 Phases of Outreach and Working Group	5-1
5.1 Phase 1 (Fall 2014-Winter 2015)	5-1
5.2 Phase 2 (Winter 2015 – Summer 2015).....	5-2
5.3 Phase 3 (Winter 2016 – Summer 2016).....	5-2
Section 6 Outreach Tools and Evaluation.....	6-1
6.1 Project Specific Stakeholder Outreach.....	6-1
6.2 Evaluation	6-5
6.3 Evaluation Data Sources.....	6-6
6.4 Public Participation Requirements	6-6

List of Tables

Table 6-1 Potential Outreach Tools	6-1
Table 6-2 General Public	6-2
Table 6-3 Public Specifically or Potentially Impacted.....	6-3
Table 6-4 Alexandria Boards and Commissions	6-3
Table 6-5 Utility Partners.....	6-4
Table 6-6 Regulatory Agencies.....	6-4
Table 6-7 Public Agencies	6-4
Table 6-8 Elected Decision Makers	6-4
Table 6-9 Alexandria City Manager and Departments	6-4



Table of Contents

List of Figures

Figure 5-1 What's Next Alexandria Framework for Engagement	5-2
--	-----

Section 1 Introduction¹

1.1 Overview, Goals and Objectives of Public Participation

The Public Participation Technical Memo builds on the overview of public participation provided by the overall Long Term Control Plan Update (LTCPU) Work Plan.² This Work Plan was submitted on May 23, 2014 to the Virginia Department of Environmental Quality (VDEQ) and approved by VDEQ on July 2, 2014.

The City of Alexandria's (the City) overall goal is to inform and educate the public about the LTCPU. Additionally, the City will actively seek to involve the affected public in the decision making process.

The components of this technical memo are consistent with guidance from several sources, including the Environmental Protection Agency (EPA), the Commonwealth of Virginia, and the City of Alexandria.³ It also follows the guidance provided in the City's *What's Next Alexandria* Handbook for Civic Engagement.⁴ It will be one of the first projects/programs implemented under this new engagement strategy. The value of engaging people effectively using this framework as the City works to create the LTCPU will accrue important benefits to Alexandria in both the short- and long-term.

Throughout the LTCPU project, the City will satisfy the statutory/regulatory requirements for public participation through outreach that reaches a broad and inclusive range of stakeholders. In so doing, the City also seeks to arrive at the best possible alternative for the LTCPU.

The specific **goals** for the City's Public Participation Plan are:

1. **Inform.** Increase stakeholder awareness of combined sewer systems and the LTCPU project and opportunities for public participation;
2. **Educate.** Develop basic knowledge or understanding of the LTCPU project and the potential effects of decision alternatives among stakeholders; and
3. **Be Responsive.** Awareness, consideration and responsiveness on the part of the City about stakeholders' views on the project and project alternatives.

¹ Background research for this Public Participation Technical Memo includes review of the following LTCPU Public Participation Plans: *Public Participation Plan for MSD of Greater Cincinnati Long Term Control Plan Update*, n.d.; *District of Columbia Long Term Control Plan Update, Public Participation Plan*, Section 10, July 2002; *City of Lynchburg, Virginia, Department of Water Resources, LTCP Report*, Section 3, Public Participation, n.d.; *New York City Department of Environmental Protection, Long Term Control Plan Public Participation Plan*, June 2012; *Philadelphia Water Department, Philadelphia Combined Sewer Overflow Long Term Control Plan Update*, Section 2, Public Participation, September 2009; and *City of Richmond, Virginia, Department of Public Utilities, CSO Re-Evaluation Final Report*, Section 3, Public Participation, January 2002.

² City of Alexandria, Department of Transportation and Environmental Services, *Combined Sewer System Long Term Control Plan Update, LTCPU Work Plan*, May 23, 2014

³ See the LTCPU Work Plan for a more detailed discussion of the regulatory requirements for public participation.

⁴ *What's Next Alexandria* Handbook, December 2013 Revised Draft.

The **objectives**⁵ that describe how the City will go about implementing these goals include:

1. **Establish and sustain an open and transparent public participation process.** Establish and sustain an open and transparent public participation process that informs, educates and gathers feedback from external and internal LTCPU stakeholders.
2. **Create awareness and educate stakeholders.** Create awareness of water quality issues in Alexandria and increase the stakeholders' knowledge of the City's ongoing initiatives to protect the environment, enhance water quality and improve quality of life in the community.
3. **Facilitate two-way communication.** Create opportunities for two-way communication with external and internal LTCPU stakeholders that enable them to provide input and ask questions about potential LTCPU project alternatives.
4. **Identify and address stakeholder concerns and questions.** Identify and respond to concerns and questions raised by external and internal LTCPU stakeholders about potential LTCPU project alternatives.
5. **Balance stakeholder expectations.** Balance stakeholder expectations for CSO project alternatives for the costs, potential impacts to residents, businesses and visitors, time horizon, and regulatory requirements.

⁵ Modeled after objectives contained in the *New York City Department of Environmental Protection, Long Term Control Plan Public Participation Plan*, June 2012.

Section 2 Stakeholders

The City will communicate with several external and internal stakeholders throughout the duration of the LTCPU project.

Emphasis will be placed on outreach to individuals, community groups, agencies/nonprofits, and businesses (especially those which may be impacted by any likely alternatives). The City will also seek to broadly inform and educate members of the public in Alexandria.

Potential Stakeholders include:

2.1 External

- General Public
 - Agenda Alexandria
 - Federation of Civic Associations
 - Alexandria Chamber of Commerce
 - Northern Virginia Building Industry Association
 - National Association of Industrial and Office Properties Northern Virginia Chapter
 - Alexandria Economic Development Partnership
 - Alexandria Convention and Visitors Bureau
- Public Specifically or Potentially Impacted
 - Ratepayers (residential and commercial)
 - Robinson Terminal Ownership
 - North Old Town Independent Citizens Civic Association (NOTICE)
 - Old Town West Citizens Association
 - Old Town Civic Association
 - Friends of Dyke Marsh
 - Hunting Terrace and Hunting Point
 - Porto Vecchio Condominium Association
- Alexandria Boards and Commissions
 - City of Alexandria Environmental Policy Commission
 - City of Alexandria Waterfront Development Commission
 - City of Alexandria Park and Recreation Commission
- Utility Partners
 - Alexandria Renew Enterprises technical staff
 - Fairfax County technical staff
- Regulatory Agencies
 - Virginia Department of Environmental Quality

- Public Agencies
 - National Park Service
 - Virginia Department of Transportation (VDOT)

2.2 Internal

- Elected Decision Makers
 - Alexandria City Council
- Alexandria City Manager and Departments
 - Planning and Zoning
 - Transportation and Environmental Services
 - Project Implementation
 - Parks and Recreation
 - Communications and Public Information
 - Water Quality Steering Committee

Additionally, the City recognizes that homeowners/condominium associations, civic associations, and business groups in the City that are not directly affected may be interested in learning about the LTCPU.

Section 3 Key Messages

The purpose of using key messages is to ensure that the information the City shares with stakeholders is aligned with the project's public participation goals throughout all phases.

1. The LTCPU project continues Alexandria's longstanding leadership role as a good environmental steward.
2. The LTCPU project enhances the quality of life for City stakeholders and the public's participation is vital to its success.
3. The LTCPU ensures the City remains in compliance with all federal/state laws and regulations for water quality.
4. The LTCPU project will result in substantial infrastructure investment over the long term.

Section 4 Challenges and Opportunities

There are several challenges and opportunities associated with achieving the City's goals for public participation as part of the LTCPU project.

4.1 Challenges

- There are limitations in CSO technology in terms of meeting the requirements for the Total Maximum Daily Load (TMDL) that the City must comply with under its DEQ permit. Depending on the practicality of the control options which are identified in the alternatives evaluation, the attainability of this requirement may warrant evaluation through the LTCPU process.
- The subject of the combined sewer system and its effective management and stewardship is complex and may not be as visible or tangible to stakeholders as other issues of public interest. Additionally, some stakeholders may be more interested than others, particularly people who live, recreate, and/or work near an outfall and/or a proposed project location.
- The duration of time needed for implementing the selected LTCPU project is long-term and it may be difficult to engage stakeholders over many years. Moreover, there is the normal turnover of residents in the City and it may be necessary to educate stakeholders who are new to the City when the time for aspects of project implementation occurs.
- The cost of implementing LTCPU projects will be borne by ratepayers and may be significant. It is essential that the City communicates the need and purpose for these projects and how they will benefit residents and businesses in Alexandria.
- Completion of the LTCPU project potentially may have negative impacts on tourism in Old Town Alexandria.

4.2 Opportunities

- Under the City's Stormwater Program, TMDLs are also being established for pollutants of concern for stormwater. There may be a limited opportunity to provide a higher level of control within the CSS to offset a portion of the stormwater load.
- The project may help beautify parts of the City, specifically near its four outfalls and potentially other locations depending on the project alternative selected.
- The project provides the City with an opportunity to engage additional people who may not have participated in discussions about other local issues.
- There is the potential for increasing public access to amenities at waterfront, including connectivity (transportation).
- The LTCPU will provide an important opportunity to educate stakeholders about the project, project alternatives and related environmental stewardship issues in the City.

Section 5 Phases of Outreach and Working Group

The City's Environmental Policy Commission studies and makes recommendations on the environmental impact of various projects and program initiatives in Alexandria, such as the LTCPU. Because the commission includes diverse representation of interests across all stakeholder categories described in Section 2, the City anticipates working closely with the EPC during all phases of the public participation process as a working group for the project. Its role as a resource and facilitative group will complement other engagement efforts included in this technical memo.

Public participation for the LTCPU will occur in three phases and mirror those described in the *What's Next Alexandria* handbook⁶ (pages 17-19). See Figure 5-1 for an overview of the framework for engagement.

City leadership will be briefed by City staff ahead of the initiation of each phase. VDEQ also will be updated on the City's public participation efforts as part of updates throughout the project. Responsiveness summaries will be prepared following each phase.

5.1 Phase 1 (Winter 2015)

The goals of this phase are informational and educational. The City seeks to establish the context for the project and the project need (including general information about the CSS and the LTCPU Work Plan, along with overall scope and goals), discuss the inclusion criteria for potential projects and a wide range of alternatives, highlight how the public can be involved, and review the project timeline.

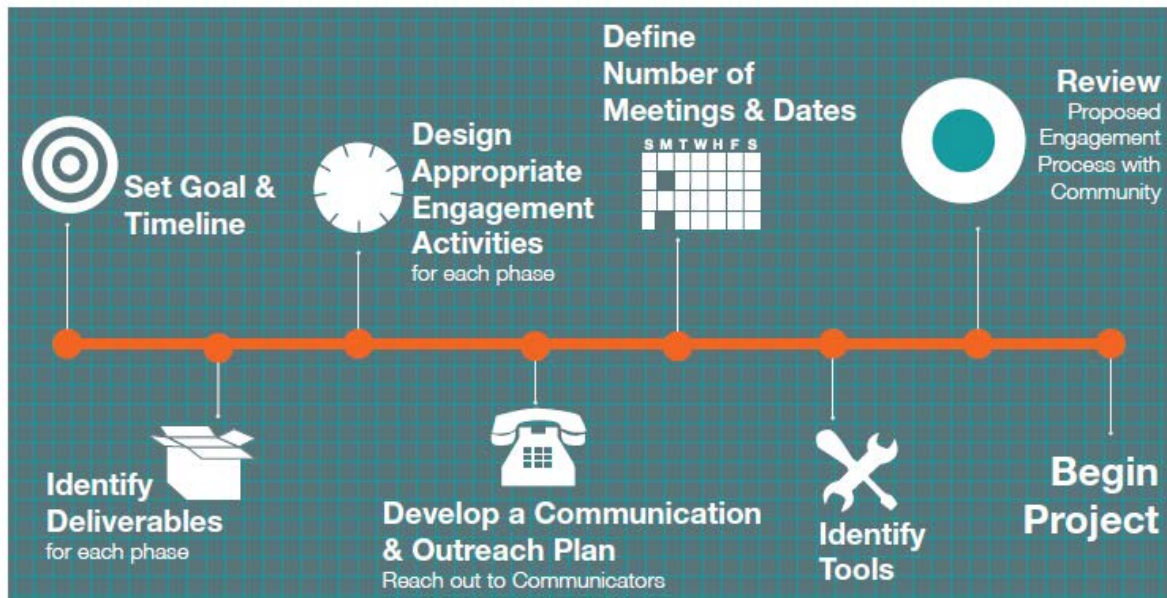
As the City's DEQ permit stipulates, the City will "explain combined sewer systems, the impacts on surface waters, progress to date on minimizing the impacts, the proposed LTCPU milestones/schedule to comply with the Hunting Creek TMDL and shall allow for public comments and inquiries."

Opportunities to use the EPC as a working group for the City's plan and to engage community groups they represent across the City throughout the process will be explored during Phase 1.

Working group meetings will be open to the public and those that focus on the LTCPU project will be publicized on the LTCPU website and via eNews articles. Stakeholder groups (particularly those impacted by the LTCPU) also will be specifically invited to the meetings via email or other medium.

⁶ *What's Next Alexandria* Handbook, December 2013 Revised Draft, pages 17-19.

Figure 5-1
What's Next Alexandria Framework for Engagement



In accordance with the City’s DEQ permit, the City will “conduct the meetings at such times as to maximize attendance.” It also requires that the City “shall utilize at least three (3) forms of media to inform the public concerning the place, time and purpose for these meetings.”

5.2 Phase 2 (Spring 2015 – Summer 2015)

The second phase will present a shortlist of LTCPU alternatives and seek input about them. Specifically, the City will actively seek input about the potential benefits and drawbacks stakeholders perceive about the LTCPU alternatives using a variety of outreach tools.

As in Phase 1, providing information and educating stakeholders will be essential. Information will continue to be provided using a variety of outreach tools about opportunities to participate. Discussing the context and project need as well as reviewing the selection criteria during this phase also will be important for educating the public about the LTCPU, especially members of the public who may not be familiar with topics related to managing environmental quality and current regulatory requirements.

5.3 Phase 3 (Winter 2016 – Summer 2016)

Phase 3 will present the recommended alternative for review with stakeholders. As with Phases 1 and 2, this is an opportunity to re-emphasize key educational messages about the project and elaborate how the selected alternative fulfills environmental quality, regulatory requirements, and other portions of the City’s selection criteria. Information about opportunities to participate also will continue to be provided using a variety of outreach tools.

The City will present the alternative at a working group meeting to which stakeholder groups are invited and also provide updates directly to stakeholder groups (particularly those impacted by the LTCPU). Additional outreach methods will be used to inform and educate stakeholders in the City.

Figure 5-2
What's Next Alexandria Principles of Engagement



Section 6 Outreach Tools and Evaluation

The City will use a range of outreach tools in support of the public participation goals of informing, educating, and gathering and responding to input from external and internal stakeholders. These potential outreach tools are listed below in Table 6-1.

Outreach tools in this section are those from which the City will choose at the appropriate time. The City does not anticipate using all the tools listed.

Table 6-1
Potential Outreach Tools

Outreach Tool	
1. Articles for external newsletters/websites	12. Outfall meeting signage
2. City website updates	13. Presentations to civic and business groups ⁷
3. Comment forms	14. Print informational materials, including translated materials
4. Enews updates ⁸	15. Public access television
5. Flyers	16. Public information depositories
6. Frequently Asked Questions (FAQs)	17. Public meeting notices
7. Information booth ⁹	18. Qualitative survey
8. Informational inserts into local newspapers	19. Responsiveness summaries
9. LTCPU email list ¹⁰	20. Social media
10. Media outreach	21. Updates to the City Council from the City Manager
11. Meeting summaries	22. Webforms

6.1 Project Specific Stakeholder Outreach

The interests and concerns of LTCPU stakeholders will vary and it will be important to tailor the City's outreach strategies for public meetings to each type of stakeholder group. See Section 2.1 for a list of specific potential stakeholder groups for each category below.

⁷ Presentations provide an opportunity to hear comments and questions from stakeholders.

⁸ Updates could be sent to the email list that respond to several questions on the same topic from different stakeholders (e.g., "Several people have written to us recently to ask the question XYZ and given the interest in this topic, we wanted to provide information to the email list at large in case others also have this question....")

⁹ The information booth provides an opportunity to hear comments and questions from stakeholders.

¹⁰ See footnote 7.

Public Participation Plan**Section 6**

Table 6-2
General Public

Strategy	Frequency
Updates on project efforts (e.g., presentations given, meeting summaries, powerpoint files, project background, status reports, how to participate) will be posted on the LTCPU website	Ongoing
Articles about the project status and encouraging public participation will be distributed to newsletters and websites for General Public stakeholders	At the start of each phase of engagement
Articles about the project status and encouraging public participation will be distributed via eNews	At the start of each phase of engagement and prior to any public meeting/hearing hosted by the working group
Outfall meeting signage will be posted	At least 30 days prior to public meetings/hearings
Public meeting/hearing notices using at least three types of media ¹¹	At least 30 days prior to public meetings/hearings
Public information depositories of print informational materials and FAQs	Material updated at the start and conclusion of each phase of engagement
Social media posts to inform the public about project updates on the City's website and opportunities to participate	As needed
Public access television announcements about project updates on the City's website and opportunities to participate	As needed
Contact General Public stakeholder groups to offer to provide a presentation	Once during each phase of engagement
Send announcements about working group meetings to eNews list	Approximately 14 days prior to each meeting
Responsiveness summaries will be posted on the City website and made available in public information depositories ¹²	Approximately 30 days following the conclusion of each phase of public participation

¹¹ The City's DEQ permit states that that permittee "shall utilize at least three (3) forms of media to inform the public concerning the place, time and purpose for the meetings."

Public Participation Plan**Section 6**

Table 6-3
Public Specifically or Potentially Impacted

Strategy	Frequency
Articles about the project status and encouraging public participation will be distributed via the LTCPU email list ¹³	At the start of each phase of engagement
Articles about the project status and encouraging public participation will be distributed to newsletters and websites for stakeholder groups specifically or potentially impacted	At the start of each phase of engagement
Contact Specifically or Potentially Impacted stakeholder groups to offer to provide a presentation	Once during each phase of engagement
Send announcements about EPC meetings to LTCPU email list ¹⁴	Approximately 14 days prior to each meeting

Table 6-4
Alexandria Boards and Commissions

Strategy	Frequency
Send announcements about working group meetings via email to all applicable board/commission staff requesting distribution to board/commission members	Approximately 14 days prior to each meeting
Contact applicable board/commission staff to offer to provide a presentation to boards/commissions	Once during each phase of engagement

Public Participation Plan**Section 6**

Table 6-5
Utility Partners

Strategy	Frequency
The PM will provide email and oral updates about the LTCPU project	As needed

Table 6-6
Regulatory Agencies

Strategy	Frequency
The PM will provide email updates about the LTCPU project as part of regular project reporting	As needed

Table 6-7
Public Agencies

Strategy	Frequency
The PM will provide email and oral updates about the LTCPU project	As needed

Table 6-8
Elected Decision Makers

Strategy	Frequency
Updates to the City Council and/or City Manager	At the start of each phase of engagement

Table 6-9
Alexandria City Manager and Departments

Strategy	Frequency
The PM will provide email and oral updates with other City departments about the LTCPU project	Monthly as needed

6.2 Evaluation

Evaluation provides a feedback loop about the public participation program in addition to feedback about the LTCPU project. There are three main aspects of evaluation that are discussed below.

City reviews of public participation program. The City will review the effectiveness of its public participation program in support of public meetings from time to time.

This may include review of standard data that the City will collect during the project about public meetings it conducts (*e.g.*, number of public meeting attendees) and other outreach strategies it employs as part of its public participation program in support of the public meetings, in addition to feedback on the public participation program itself that is received from stakeholders. When available, the City will also consider feedback provided by stakeholder groups, such as questions or comments about the LTCPU public participation program that are provided at a civic association meeting.

By periodically reviewing metadata about who is participating, when and where, the City may be able to determine which outreach tools are more effective in reaching specific stakeholders (and are working well in reaching these individuals and groups) and stakeholders who are not participating (meaning that current outreach tools are not as effective for some individuals and groups) at public meetings. These insights can guide the City in determining different outreach tools that may be needed to engage a full range of stakeholders about the LTCPU project.

City staff will review feedback received and discuss staff observations about the public participation program in support of public meetings it is implementing at its project meetings. Goals and objectives will be discussed to determine how well current efforts are meeting their intent. Recommendations for strategies and tools that can enhance the effectiveness of the public participation program in support of public meetings will be documented and considered for implementation by staff. Specific participation requirements of the VDEQ permit also will be reviewed.

Responsiveness and meeting summaries. The City will provide responsiveness summaries that demonstrate the City has received and considered input from stakeholders about project alternatives. Responsiveness summaries are reports prepared at key points in the public participation process that note feedback/questions received and the City's response. They also include feedback about the public participation program itself.

The City also may gather feedback from working group members on project alternatives via a qualitative survey.

Meeting summaries also will be prepared following public meetings with the working group and posted on the LTCPU website shortly thereafter. Typically, meeting summaries also will be prepared that recap the discussion and comments received at community presentations and posted on the LTCPU website shortly thereafter.

In addition to acknowledging feedback provided by the public, both responsiveness and meeting summaries are valuable in educating stakeholders about projects opportunities and constraints and they reinforce that the public's input has been considered.

Documentation of the process. In addition to continued efforts to enhance public engagement throughout the project, documentation of the process is essential to demonstrate the City has met project goals and that the City has complied with all necessary state and federal regulations and laws for public participation. Therefore, maintaining written, print and electronic files of all outreach tools used and feedback received from the public is vital.

The City will create and maintain a log of contacts from the public throughout the LTCPU project's duration. The log may be an Excel spreadsheet (for example, with a tab each for meeting attendees by date, email comments received, phone calls, etc.) or another format of electronic file, with the goal that it will capture feedback received from the public about the project via email, telephone, web form submissions, written letters and in-person discussions.

It is easiest to compile the information as the project proceeds to ensure a comprehensive collection of data is being prepared. Periodic reviews of the file also can ensure that essential information is not mistakenly omitted from the record. Depending on which outreach tools are used, the file may be comprised of the items listed below as well as supplemental data identified.

6.3 Evaluation Data Sources

- Public meeting data
 - For all public meetings hosted by the City, date of meeting, time, purpose, location, number of attendees, speakers, brief agenda, and other pertinent meeting information
 - Sign in sheets at public meetings, including permission to add people to the LTCPU email list
 - Comment forms received
 - Copies of all meeting notices (press release, flyer, email, eNews, signs, newspaper announcements)
 - Meeting summaries
 - All presentations given (PowerPoints)
 - List of all print materials provided by meeting date
 - Recordings of interviews and announcements on public access television

6.4 Public Participation Requirements

- Checklist of Public Participation Requirements
 - Conduct public meetings at such times as to maximize attendance (DEQ permit)
 - Use at least three (3) forms of media to inform the public concerning the place, time and purpose for these meetings (DEQ permit)
 - Public information depository (Consistent with CSO Policy)

- Copies of information to the public (Consistent with CSO Policy)
- Notification list (Consistent with CSO Policy)
- Public notification for public meetings and hearings hosted by the City (Consistent with CSO Policy)
- Prepare responsiveness summaries (Consistent with CSO Policy)



GREELEY AND HANSEN